

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN**

SARAH,

Plaintiff,

v.

GOOGLE LLC, YOUTUBE LLC,  
JAMES JACKSON, also known online as  
“ONISION,” and LUCAS JACKSON,  
formerly known online as  
“LAINEYBOT,” “LAINEY” and “KAI,”

Defendants.

CASE NO. 1:23-CV-00223

HON. HALA Y. JARBOU

**PLAINTIFF’S RESPONSE TO ORDER TO SHOW CAUSE**

On March 2, 2023, Plaintiff Sarah, (“Plaintiff”) initially filed this action (Dkt. No. 1) for civil damages against YouTube LLC (“YouTube”) and its parent company, Google, LLC (“Google”), James Jackson known online as “Onision,” (hereinafter “Onision”) and Lucas Jackson, formerly known online as “Laineybot,” “Lainey,” and “Kai,” (hereinafter “Lucas”) under the federal statutes 18 U.S.C. § 1595, Trafficking Victims Protection Reauthorization Act, 18 U.S.C. § 2255, Civil Remedies for Personal Injuries, and related state law claims arising from Defendant’s conduct.

Defendants YouTube and Google waived service of the summons related to this case on March 7, 2023. Defendants Onision and Lucas were served on March 10, 2023. Plaintiff sought the position of Defendants for proceeding pseudonymously. Although Defendants Onision and Lucas have yet to have any attorney file an appearance, the attorney for Google and YouTube has represented that neither Google nor YouTube, have an objection to Plaintiff proceeding pseudonymously after

conferring on the same. It serves judicial economy to be able to advise the Court as to the position of the parties at the time of filing.

Furthermore, beyond filing proof of service, no party has filed anything substantively. To comply with Rule 10(a), Plaintiff must request permission from the Court before proceeding pseudonymously. To date, nothing has been filed except proof of service. This Court has not been asked to rule on a Motion to Dismiss, nor has any Defendant filed a responsive document to the pleadings. As such, it would be improper at this preliminary stage to dismiss the Complaint because Plaintiff is still within the window of time to request this Court to allow her to proceed pseudonymously – namely, before this Court is asked to rule on any motion in the case. *See Nat'l Commodity & Barter Ass'n v. Gibbs*, 886 F.2d 1240 (10th Cir. 1989) (dismissed claim pursuant to a motion to dismiss).

Plaintiff filed the Motion for Leave to file Pseudonymously on March 28, 2023 (Dkt. No. 11). Should this Court grant Plaintiff's motion, then Plaintiff's permission to proceed would be granted. As reflected in Plaintiff's Motion for Leave to file Pseudonymously, Defendants Onision and Lucas already know the true identity of Sarah, and Plaintiff is willing to disclose the true identity of Sarah to all parties.

WHEREFORE, Plaintiff requests that this Court discharge the Order to Show Cause, as Plaintiffs have timely filed a motion seeking leave to file pseudonymously.

DATED: March 28, 2023

/s/ Lisa D. Haba

Lisa D. Haba

**THE HABA LAW FIRM, P.A.**

1220 Commerce Park Dr., Suite 207

Longwood, FL 32779

Telephone: (844) 422-2529

lisahaba@habalaw.com

/s/ James R. Marsh

James R. Marsh (MBN: P85170)

Margaret E. Mabie

**MARSH LAW FIRM PLLC**

31 Hudson Yards, 11th Floor

New York, New York 10001

Telephone: (212) 372-3030

jamesmarsh@marsh.law

margaretmabie@marsh.law

*Attorneys for Plaintiff*